Chris,
This is an ownership (not name) change, only.

D. Golumbek

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

MARWAN M. SADAT, P.E.
DIRECTOR

LINO F. PEREIRA, P.E.
DEPUTY DIRECTOR

- 1 JUN 1984

operator address

Richard G. Speed, P.E.
Technical Superintendent Manufacturing
322 West Main Street
Marenci, Michigan 49256

Re: Ownership Transfer, Parker Chemical Co.,
EPA ID No. NJD056709421

Dear Mr. Speed:

This will acknowledge receipt of the May 10, 1984 transmittal of a March 15, 1984 Surety Bond which guarantees payment into a March 15, 1984 Trust Agreement as financial assurance for closure of the Wayne, N.J. facility identified by the above shown EPA I.D. numbers.

Previously received by this Bureau on April 5, 1984 was a March 30, 1984 financial test certification document covering liability due to sudden accidental occurrences.

All of these original documents are consistent with current New Jersey Hazardous Waste facility requirements with respect to wording, effective dates, and liability limits and are considered acceptable by the Department.

Additionally, a revised Part A application dated 9/28/83 has been received and outlines adequately the facility operations under the new owners.

In view of the foregoing, which is in accordance with the provisions of NJAC 7:26-12.3(c)4, the new owner has demonstrated compliance with the procedures required to effect ownership or operational control of an existing facility.

The name of the facility is changed to:
PARKER CHEMICAL CO.

new owner

Parker Chemical Company is a wholly-owned subsidiary of Ford Motor Company.

old owner

The old owner, Occidental Chemical Corporation is hereby notified by copy of this letter, that it no longer needs to comply with financial assurance cited previously for the Wayne, N.J. site.

The new owner is reminded that any person operating an existing hazardous waste facility prior to final disposition of a permit application shall comply with all applicable provisions of NJAC 7:26-7.1 et seq. through 11.1 et seq.

Should you have any questions, please contact Erwin Rutkowski of my staff at (609) 292-5361.

Very truly yours,

Frank Coolick

Frank Coolick, Chief,
Bureau of Hazardous Waste Engineering

EP5:drg

cc: J. Golumbek - USEPA Region II
S. Schiffman - DWM BHWCM
P. Struble - Parker Chemical Co.
P.O. Box 188
Wayne, N.J. 07470
Dr. A. Katona - Occidental Chem. Center
360 Rainbow Blvd.
Box 728
Niagra Falls, N.Y. 14302

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-029

HAZARDOUS WASTE MANAGEMENT FACILITY INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Parker Amchem Company

FILE NUMBER: 16-14-04

VHT FACILITY FILE NUMBER:

PERMIT #: -

REGION: N

INSPECTION DATE: 2/21/92

INCIDENT/CASE NUMBER:

INSPECTION TYPE: TSD

RESPONSIBLE AGENCY CODE:

INSPECTOR'S NAME: Brian Farbanish

INSPECTOR'S AGENCY: Office of Enforcement Policy

INSPECTOR'S BUREAU: NBFO

EPA ID NUMBER: NJD056709421

ADDRESS:
557 Route 23 P.O. Box 188
Wayne, New Jersey 07470

LOT: 11 BLOCK: 168

COUNTY: Passaic

FACILITY PERSONNEL: Philip Struble

TELEPHONE #: 201-694-2380

OTHER STATE/EPA PERSONNEL:

REPORT PREPARED BY: Brian Farbanish

REVIEWED BY: Darnell Holt

PHOTOS TAKEN: (__) YES (✓) NO

SAMPLE TAKEN: (__) YES (✓) NO

If yes, how many?

NO. OF SAMPLES: —— NJDEP ID #: _____

MANIFESTS REVIEWED: (✓) YES (__) NO

Number of Manifests in Compliance: 49

Number of Manifests Not in Compliance: 0

List Manifest Document Numbers of Those Manifests Not in Compliance:

Describe the activities that result in the generation of hazardous waste.

Washing the blending tanks (rinse water)
- The mixing/blending tanks are rinsed after the mixed material is removed from the mixing tanks
- Waste water is also generated during the washing of the floors in the mixing/blending room
- Waste water is generated in the fume scrubber

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes).

none

To The File
From Brian Farbanish
Through Farouk Afrasiabi
Parker Amchem (PA), 557 Route 23 Wayne, N.J.
EPA ID Number NJD056709421
2/20/92

FACILITY DESCRIPTION AND OPERATIONS
SUMMARY OF FINDINGS

PA is a small sized facility that employs approximately 5 people on a 2 acre site. The employees operate one eight hour shift each day, Monday through Friday. These shifts contribute to the batch processing operation performed by this facility.

Currently, PA is listed as a TSD (Treatment, Storage and Disposal) facility. PA had previously requested to be delisted from TSD to generator. On May 11, 1990, Anthony Adamo of the NJDEPE conducted a delisting inspection at this facility. It was later discovered that a portion of the soil in the rear of the building was contaminated. This discovery resulted in the denial of the delisting request. The soil was then sampled. Currently, PA is in the process of obtaining the approval required by the various NJDEPE departments before the soil removal can begin.

As of this date, PA is not treating hazardous waste on site and is not storing hazardous waste over 90 days. While the TSD regulations do not apply to this facility, the NJAC 7:26 generator RCRA regulations do apply.

PA is involved in the mixing and blending of metal pretreatment chemicals to be used on various metals (such as for cars and appliances). As described by Mr. Struble (the Facility Manager), first PA receives the mixture order. The material is then either taken out of storage or out of one of two (15,000 gallon) raw material storage tanks located outside the building on the south side. It is then mixed/blended in one of five mixing/blending units (one 2000 gallon unit, one 1000 gallon unit, two 600 gallon units or one 500 gallon unit). The newly blended material is then removed from the mixing unit, tested (for various customer specifications) in the QC laboratory, packaged in 55 gallon drums or in bulk loads and shipped to the customer.

The hazardous waste generated by PA is from the washing of the mixing/blending units after the mixing process is complete. According to Mr. Struble, these units are washed (after the completion of an order) only if the next order is completely different. If the new order is similar to the prior order, the mixing/blending units are not washed.

The one 500 gallon unit mentioned above is used solely for mixing items which contain chromium. PA is presently reducing the amount of chromium mixing/blending being performed at the site. The chromium unit is not washed after every use. It is washed only when repairs are required on the unit (as are the other units) and when the appropriate customer specifications can no longer be met.

Waste water (hazardous waste) is also generated from the washing of the mixing/blending room floors, from the rinsing of the mixing/blending unit liners, valves and hoses and from the fume scrubber. The fume scrubber is used to vent the material from the mixing/blending units. This fume scrubber, draws in the dust from the mixing/blending units and applies a mist. The mist (along with the waste water from the other washings) is drained into various drains throughout the mixing/blending area.

The drains lead to an approximately 300 gallon transfer tank. On a daily basis, the material is transferred to one of two 10,000 gallon holding tanks. The waste in these tanks is stored for less than 90 days (approximately 2 months). As one tank becomes full, the material in the tank is sampled. Occasionally, this sampling indicates that the material in the storage tanks is non-hazardous. Presently, the one tank contains approximately 9,000 gallons of waste water. As explained by Mr. Struble,

To The File
From Brian Farbanish
Through Farouk Afrasiabi
Parker Amchem (PA), 557 Route 23 Wayne, N.J.

Facility Description And Operations Continued

this tank will soon be sampled. The material in this tank will then be removed by tanker truck and disposed of according to the sampling results. Currently, PA does not consider the material in this tank to be hazardous waste. If the sampling results indicate that this material is hazardous, then it will be manifested off site as a hazardous waste according to the 90 day accumulation start date (currently, the accumulation start date for this tank is 1/10/92).

As the first tank becomes full, the main valve is shut off and the waste water is transferred from the holding tank to the second 10,000 gallon storage tank.

No violations were issued at the conclusion of the inspection.

HAZARDOUS WASTE FACILITY STANDARDS

		YES	NO	N/A
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	✓		
7:26-7.4(a)4i	The generator's name, address and phone number.	✓		
7:26-7.4(a)4ii	The generator's EPA ID number.	✓		
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓		
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓		

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓	—	—
7:26-7.4(a)1x	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	—	—	✓
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	✓	—	—
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓	—	—
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓	—	—
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓	—	—
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓	—	—
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓	—	—
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓	—	—
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓	—	—
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	—	—	✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	—	—	✓

		YES	NO	N/A
7:26-9.4(b)	Waste Analysis			
7:26-9.4(b)1i	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis most contain all the information necessary for proper treatment storage or disposal of the waste).	—	—	✓
7:26-9.4(b)1iii	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one:	—	—	✓
	Waste characteristics vary: —			
	All waste(s) are basically the same: —			
	Company treats all waste(s) as hazardous: —			
7:26-9.4(b)2	Is there a written waste analysis plan at the facility?	—	—	✓
	Does it contain:			
7:26-9.4(2)i	Parameters for which each hazardous waste stream will be analyzed including constituents listed in NJAC 7:26-8.16 and the rational for the selection of these parameters?	—	—	✓
7:26-9.4(b)2ii	The test methods which will be used to test for these parameters?	—	—	✓
7:26-9.4(b)2iii	The sampling method which will be used to obtain a representative sample of the waste to be analyzed?	—	—	✓
7:26-9.4(b)2iv	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?	—	—	✓
7:26-9.4(b)2v	For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply?	—	—	✓
7:26-9.4(b)2vii	Procedures which will be used to identify changes in waste stream characteristics?	—	—	✓
	Does hazardous waste come to this facility from an outside source? (e.g., another generator).	—	—	✓
	If yes, list the name(s) of generators.			

		YES	NO	N/A
7:26-9.4(b)4	If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?			✓
	Does the plan describe:			
7:26-9.4(b)4i	The procedures which will be used to determine the identity of each shipment of waste managed at the facility?			✓
7:26-9.4(b)4ii	The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?			✓
7:26-9.4(c)1	Did the facility accept hazardous waste which it is not authorized to handle?			✓
7:26-9.4(i)	Are all records and results of waste analysis performed pursuant to NJAC 7:26-9.4(b) and 9.4(e) as applicable written in the operating log?			✓
7:7:26-9.4(h)	<u>Security</u>			
	Does the facility have:			
7:26-9.4(h)1i	A 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?			✓
7:26-9.4(h)1ii	An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility?			✓
7:26-9.4(h)3	Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?			✓
	If no, explain what measures are taken for security.			

		YES	NO	N/A
7:26-9.4(f)	General Inspection Requirements			
7:26-9.4(f)1	Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:			
7:26-9.4(f)1i	Discharge of hazardous waste constituents to the environment?			✓
7:26-9.4(f)1ii	A threat to human health?			✓
7:26-9.4(f)3	Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to environmental or human health?			✓
7:26-9.4(f)3i	Did the owner or operator submit the written inspection schedule to the department?			✓
	If yes, when was it submitted?			✓
7:26-9.4(f)3iii	Is the written inspection schedule kept at the facility?			✓
7:26-9.4(f)3iv	Does the schedule identify the types of problems to be looked for during the inspection?			✓
7:26-9.4(f)3v	Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?			✓
7:26-9.4(f)5	Is there evidence that problems reported in the inspection log have not been remedied?			✓
7:26-9.4(f)6	Does the owner/operator record inspections in a log?			✓

		YES	NO	N/A
7:26-9.4(f)6	Are these records kept for at least three (3) years from the date of inspection?			✓
7:26-9.4(f)6	Does the records include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?			✓
7:26-9.4(g)	**Personnel Training**			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training within six months of having been employed?	✓		
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?	✓		
7:26-9.4(g)5	If yes, have facility personnel taken part in an annual review of training?	✓		
	Is there written documentation of the following:	✓		
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	✓		
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	✓		
7:26-9.4(g)6iii	A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?	✓		
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	✓		

		YES	NO	N/A
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓		
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?	✓		
7:26-9.6	<u>Preparedness and Prevention</u> Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-9.6(b)1	An internal communications or alarm system?	✓		
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	✓		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	✓		
7:26-9.6(c)	Is equipment tested and maintained?	✓		
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?			✓
	If no, please explain.			

		YES	NO	N/A
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?		—	—
	Explain. aisle space not required for 2 waste water storage units - no drums stored on site			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site?	✓	—	—
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	✓	—	—
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	—	—	✓
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?	✓	—	—
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	✓	—	—
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two inspections annually?	✓	—	—
7:26-9.7	<u>Contingency Plan and Emergency Procedures</u>			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	✓	—	—

		YES	NO	N/A
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?			✓
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	✓		
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with NJAC 7:1E-4.1 et seq.?	✓		
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	✓		
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services?	✓		
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates?	✓		

		YES	NO	N/A
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?	✓	—	—
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?	✓	—	—
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:			
	1. Maintained at the facility; and	✓	—	—
	2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?	✓	—	—
7:26-9.7(k)	Is there at least one employee on site or on call with the responsibility of coordinating all emergency response measures?	✓	—	—
7:26-9.8	<u>Closure Plan</u>			
7:26-9.8(c)	Does the facility have a written closure plan?	—	—	✓
	Does the owner/operator keep a written copy of the closure plan and all revisions to the plan at the facility?	—	—	✓
	If yes, does the plan include:			

		YES	NO	N/A
7:26-9.8(e)1i	A description of how and when the facility will be partially closed (if applicable) and ultimately closed?			
7:26-9.8(e)1ii	The maximum extent of the operation which will be open during the life of the facility?			
7:26-9.8(e)2	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?			
7:26-9.8(e)3	A description of the steps needed to decontamination facility equipment during closure?			
7:26-9.8(e)4	A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure?			
	Post Closure Plan			
7:26-9.9(g)	Does the facility have a written post-closure plan kept at the facility?			
	If yes, does the plan:			
7:26-9.9(i)	Identify the activities which will be carried on after closure and the frequency of these activities?			
7:26-9.9(i)1	Include a description of the planned ground water monitoring activities and frequencies at which they will be performed?			
7:26-9.9(i)2	Include a description of the planned maintenance activities, and frequency at which they will be performed, to insure the following:			
7:26-9.9(i)2i	The integrity of the cap and final cover or other containment structures where applicable?			
7:26-9.9(i)2ii	Describe the function of the facility monitoring equipment?			

		YES	NO	N/A
7:26-9.9(i)3	Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?			
	Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
	If yes, what is it?			

Please circle all appropriate activities and answer questions in appropriate sections all activities circled.

Storage	Treatment	Disposal
Container	Tank	Landfill
Tank, Above Ground	Surface Impoundments	
Tank, Below Ground	Incineration	Surface Impoundments
Surface Impoundments	Thermal Treatment	Other _____
Waste Piles		
Other _____	Chemical, Physical and Biological Treatment	
Other _____		

7:26-9.4(d) Containers

What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone).

7:26-9.4(d)1i Do the containers appear to be o sturdy leakproof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste? — — ✓

If no, explain.

		YES	NO	N/A
7:26-9.4(d)1ii	Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste?			
	If no, explain.			
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?			
7:26-9.4(d)2	If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)3	Are hazardous wastes stored in containers made of compatible materials?			
7:26-9.4(d)4i	Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?			
	If no, explain.			
7:26-9.4(d)4iii	Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?			
	If no, explain.			
7:26-9.4(d)iv	Are containerized hazardous wastes segregated in storage by waste type?			
7:26-9.4(d)v	Are containerized hazardous wastes arranged so that their identification label is visible?			
7:26-9.4(d)5	Does the owner/operator inspect the container storage area at least daily, looking for leaks and for deterioration caused by corrosion or other factors?			
7:26-9.4(d)6	Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?			

		YES	NO	N/A
7:26-9.4(d)7i	Are incompatible wastes, or incompatible wastes and materials placed in the same container?			
	If yes, explain.			
7:26-9.4(d)7ii	Are hazardous wastes placed in unwashed containers that previously held incompatible wastes?			
	If yes, explain.			
7:26-9.4(d)7iii	Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from the other materials or protected from them by means of a dike, berm, wall or other device?			
7:26-9.4(e)1i	Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction?			
	If no, explain.			
7:26-9.4(e)1ii	Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled?			
	If no, explain.			
7:26-9.4(e)1iii	Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste?			
	If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health.			

		YES	NO	N/A
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?	—	—	—
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?	—	—	—
7:26-9.4(e)2v	Threaten human health or the environment?	—	—	—
7:26-11.2	**Tanks**			
	What are the approximate number and size of tanks containing hazardous waste? 2 - 10000 gallon	—	—	—
	Identify the waste treated/stored in each tank. D002 or D003			
	General Operating Requirements			
7:26-11.2(a)2	Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?	—	✓	—
	If yes, please explain.			
	Are there leaking tanks?	—	✓	—
7:26-11.2(a)2	Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures?	✓	—	—
7:26-11.2(3)	Do uncovered tanks have at least two feet of freeboard or an adequate containment structure?	✓	—	—
7:26-11.2(a)4	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?	—	—	✓
7:26-11.2(c)	**Inspections**			
	Is the tank(s) inspected for:			
	1. Discharge control equipment (each operating day).	✓	—	—

		YES	NO	N/A
	2. Monitoring equipment (each operating day).	✓		
	3. Level of waste in tank (each operating day).	✓		
	4. Construction of materials of the tank (weekly).	✓		
	5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures (weekly)?	✓		
7:26-11.2(a)	Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	✓		
	If no, please explain.			
7:26-11.2(f)	Does it appear that incompatible wastes are being stored separate from each other?	✓		
7:26-9.2(b)	Are there underground tanks used to store hazardous waste?		✓	
	If yes, how many and can they be entered for inspection?			✓
	Has the underground tank been in use on or before November 19, 1980? Specify Date.			✓
	If no, when was the tank placed in use?			
7:26-9.2(b)3i	Does the facility have a ground water monitoring plan approved by the department?			✓
7:26-9.2(b)3ii	Is the use of the tank specified to the manufacturers recommended lifetime?	✓		
7:26-11.3	Surface Impoundments			
	Describe the design and operating features of the surface impoundment to prevent ground water contamination (e.g., liner leachate collection system).			
	Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of waste stored and treated.			

		YES	NO	N/A
7:26-11.3(a)	Is there at least two feet of freeboard in the impoundment?			
7:26-11.3(b)	Do all earthen dikes have a protective cover to preserve their structural integrity?			
	If yes, please specify the type of covering.			
7:26-9.4(c)1	Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?			
7:26-9.4(i)	Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?			
7:26-11.3(d)	Does the owner or operator inspect:			
7:26-11.3(d)1	The freeboard level at least once each operating day to ensure compliance with subsection 11.3(a)?			
7:26-11.3(d)2	The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?			
7:26-11.3(f)	Is ignitable or reactive waste placed in the surface impoundment?			
7:26-11.3(f)1	If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?			
7:26-11.3(f)1i	Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?			

		YES	NO	N/A
7:26-11.3(f)1ii	Is the waste treated, rendered or mixed so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, of gases in sufficient quantities to threaten human health?			
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?			
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?			
7:26-9.4(e)2v	Threaten human health or the environment?			
7:26-11.3(f)2	Is the surface impoundment used solely for emergencies?			
7:26-11.3(g)	Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?			
	If yes, is the waste managed so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?			
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?			
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?			
7:26-9.4(e)2v	Threaten human health or the environment?			
7:26-11.4	<u>Landfills</u>			
	Identify the types of waste and size of the landfill.			
	<u>General Operating Requirements</u>			
7:26-11.4(a)1	Is run-on diverted away from all portions of the landfill?			

		YES	NO	N/A
7:26-11.4(a)9ii	Is the container very small, such as an ampule?			
7:26-11.4(a)10	Are empty containers crushed flat, shredded, or similarly reduced in volume before it is buried beneath the surface of a hazardous waste landfill?			
7:26-11.4(a)11	Does the owner or operator of a hazardous waste landfill continue to dispose of hazardous wastes subsequent to the detection of any liquid, in the secondary collection system?			
7:26-11.4(b)	Does the owner or operator of a hazardous waste landfill maintain an operating record required in NJAC 7:26-9.4(i)?			
7:26-11.4(b)1	Does the owner/operator maintain a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks?			
7:26-11.4(b)2	The contents of each cell and the appropriate location of each hazardous waste type within each cell?			
	Are containers holding liquid waste or waste containing free liquids placed in the landfill?			
	Please describe the types and contents of such containers placed in the landfill.			
	Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried?			
	Are small containers of hazardous waste in overpacked drums placed in the landfill?			
	If yes, please describe precautions taken to prevent the release of the waste.			
7:26-11.5	<u>Incinerator</u>			
	What type of incinerator is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			

		YES	NO	N/A
	Is the residue from the incinerator a hazardous waste?			
	What types of air pollution control devices (if any) are installed in the incinerator unit?			
	Is energy recovered from the process?			
	If yes, describe.			
	What is the destruction and removal efficiency for the organic hazardous waste constituents?			
7:26-11.5(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
7:26-11.5(b)1i	Heating value of the waste?			
7:26-11.5(b)1ii	Halogen and sulfur content?			
7:26-11.5(b)1iii	Concentrations of lead and mercury?			
7:26-11.5(2)	If no to any of the above questions, is there justification and documentation?			
	If operating, does it appear the incinerator is operating at steady state for conditions of operation, including temperature and air flow?			
	<u>Monitoring and Inspection</u>			
7:26-11.5(c)1	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?			
	If no, explain.			
7:26-11.5(c)1	Does the incinerator have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).			
	If no, explain.			
7:26-11.5(c)2	Is the stack plume observed visually at least hourly for opacity and color?			

		YES	NO	N/A
7:26-11.5(c)3	Are there any signs of leaks, spill and fugitive emission associated with the pumps, valves, conveyors, pipes, etc.?			
	If yes, describe.			
7:26-11.5(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?			
	Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained.			
	If yes, explain.			
7:26-11.5(c)3	Is the incinerator inspected daily?			
7:26-11.6	Thermal Treatment			
	What type of thermal treatment is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			
	List the types and quantities of hazardous waste thermally treated.			
	Is the residue from the thermal treatment unit a hazardous waste?			
	What types of air pollution control devices (if any) are installed in the thermal treatment unit?			
	Is energy recovered from the process?			
	If yes, describe.			
	What is the destruction and removal efficiency for the organic hazardous waste constituents?			
7:26-11.6(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
7:26-11.6(b)1i	Heating value of the waste?			
7:26-11.6(b)1ii	Halogen and sulfur content?			
7:26-11.6(b)1iii	Concentrations of lead and mercury?			

		YES	NO	N/A
7:26-11.6(2)	If no to any of the above questions, is there justification and documentation?	—	—	—
	If operating, does it appear the thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?	—	—	—
	Monitoring and Inspection			
	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?	—	—	—
	If no, explain.			
7:26-11.6(c)1	Does the thermal treatment have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).	—	—	—
	If no, explain.			
7:26-11.6(c)2	Is the stack plume observed visually at least hourly for opacity and color?	—	—	—
7:26-11.6(c)3	Are there any signs of leaks, spills and fugitive emission associated with the pumps, valves, conveyors, pipes, etc?	—	—	—
	If yes, describe.			
7:26-11.6(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?	—	—	—
	Is there any reason to believe the thermal treatment unit is being operated improperly? i.e., steady state conditions are not maintained.	—	—	—
	If yes, explain.			
7:26-11.6(c)3	Is the thermal treatment inspected daily?	—	—	—
7:26-11.6(e)	Is there open burning of hazardous waste?	—	—	—
	If yes, what is being burned? (Only burning or detonation of explosives is permitted).			

		YES	NO	N/A
	If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?			
7:26-11.7	Chemical, Physical and Biological Treatment (Other than in tanks, surface impoundments or plant treatment facilities). Describe the treatment system at this facility and the types of wastes treated.			
7:26-11.7(a)2	Does the treatment process system show any signs or ruptures, leaks or corrosion? If yes, describe.	—	—	—
7:26-11.7(a)3	Is there a means to stop the inflow of continuously fed hazardous wastes?	—	—	—
	Inspections			
7:26-11.7(c)1	Is the discharge control safety equipment (e.g., waste feed cut-off systems, bypass systems, drainage systems and pressure relief systems) in good working order?	—	—	—
7:26-11.7(c)1	Are they inspected at least once each operation day?	—	—	—
7:26-11.7(c)2	Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?	—	—	—
7:26-11.7(c)2	Is data gathered at least once each operating day?	—	—	—
7:26-11.7(c)3	Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?	—	—	—
7:26-11.7(c)4	Are the discharge confinement structures (e.g., dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).	—	—	—

7:26-11.7(e)1	Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?	—	—	—
	If yes, explain how.			
7:26-11.7(f)	Are the incompatible wastes placed in the same treatment process?	—	—	—
	If yes, please explain.			
7:14A-6	<u>Ground Water Monitoring</u>			
	(Applies only to: Surface impoundments, landfills, land disposal facilities).			
7:14A-6.2	Does the owner/operator have a ground water monitoring plan approved by the department and capable of determining the facility's impact on the quality of ground water?	—	—	—
	If no, please explain.			
	How many monitoring wells has the facility installed?			
	What is the depth to ground water?			
	How many deep monitoring wells are on site? (Indicate depth of monitoring wells).			
	How many shallow monitoring wells are on site? (Indicate depth of monitoring wells).			
7:14A-6.3(a)	Is the ground water monitoring system capable of yielding ground water samples for analysis?	—	—	—
	If no, please explain.			
7:14A-6.3(a)1	Are monitoring wells installed hydraulically upgradient?	—	—	—
	If yes, specify how many and the depth of each.			

		YES	NO	N/A
7:14A-6.3(a)2	How many monitoring wells are installed hydraulically downgradient?			1
	If yes, specify how many and the depth of each.			
7:14A-6.4(a)	Does the owner/operator have a ground water sampling and analysis plan?			
	If no, please explain.			
7:14A-6.4(a)	Does the plan include procedures and techniques for:			
	1. Sample Collection			
	2. Sample Preservation and Shipment			
	3. Analytical Procedures			
	4. Chain of Custody			
	List the types and quantities of hazardous waste incinerated.			
7:26-9.4(b)3	Did the owner or operator submit the waste analysis plan to the Department?			
	If yes, when was the plan submitted?			

CONFIDENTIAL - RECOMMENDATIONS

TO: _____

FROM: _____ DATE: _____

SUBJECT: _____

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Parker Amchem Company

U.S. EPA ID No.: NJD056209421

Street: 557 Route 23

City: Wayne State: NJ Zip: 07470

Telephone: 201-694-2380

Inspection Date: 7/21/92 Time: 1300 (am/pm)

Weather Conditions: cloudy ~40°

	Name	Agency/Title	Telephone
Inspectors:	Brian Fairbanks	NJDEPE/Env Spec	201-299-3592
Facility Representatives:	Philip Strubbe	Parker/Facility Manager	201-694-2380

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents					
F020-F023 and F026-F028					
California List*	✓				✓
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	✓				✓

* See Appendix A

To The File
From Brian Farbanish
Through Farouk Afrasiabi
Parker Amchem (PA), 557 Route 23 Wayne, N.J.
EPA ID Number NJD056709421
2/20/92

FACILITY DESCRIPTION AND OPERATIONS
SUMMARY OF FINDINGS

PA is a small sized facility that employs approximately 5 people on a 2 acre site. The employees operate one eight hour shift each day, Monday through Friday. These shifts contribute to the batch processing operation performed by this facility.

Currently, PA is listed as a TSD (Treatment, Storage and Disposal) facility. PA had previously requested to be delisted from TSD to generator. On May 11, 1990, Anthony Adamo of the NJDEPE conducted a delisting inspection at this facility. It was later discovered that a portion of the soil in the rear of the building was contaminated. This discovery resulted in the denial of the delisting request. The soil was then sampled. Currently, PA is in the process of obtaining the approval required by the various NJDEPE departments before the soil removal can begin.

As of this date, PA is not treating hazardous waste on site and is not storing hazardous waste over 90 days. While the TSD regulations do not apply to this facility, the NJAC 7:26 generator RCRA regulations do apply.

PA is involved in the mixing and blending of metal pretreatment chemicals to be used on various metals (such as for cars and appliances). As described by Mr. Struble (the Facility Manager), first PA receives the mixture order. The material is then either taken out of storage or out of one of two (15,000 gallon) raw material storage tanks located outside the building on the south side. It is then mixed/blended in one of five mixing/blending units (one 2000 gallon unit, one 1000 gallon unit, two 600 gallon units or one 500 gallon unit). The newly blended material is then removed from the mixing unit, tested (for various customer specifications) in the QC laboratory, packaged in 55 gallon drums or in bulk loads and shipped to the customer.

The hazardous waste generated by PA is from the washing of the mixing/blending units after the mixing process is complete. According to Mr. Struble, these units are washed (after the completion of an order) only if the next order is completely different. If the new order is similar to the prior order, the mixing/blending units are not washed.

The one 500 gallon unit mentioned above is used solely for mixing items which contain chromium. PA is presently reducing the amount of chromium mixing/blending being performed at the site. The chromium unit is not washed after every use. It is washed only when repairs are required on the unit (as are the other units) and when the appropriate customer specifications can no longer be met.

Waste water (hazardous waste) is also generated from the washing of the mixing/blending room floors, from the rinsing of the mixing/blending unit liners, valves and hoses and from the fume scrubber. The fume scrubber is used to vent the material from the mixing/blending units. This fume scrubber, draws in the dust from the mixing/blending units and applies a mist. The mist (along with the waste water from the other washings) is drained into various drains throughout the mixing/blending area.

The drains lead to an approximately 300 gallon transfer tank. On a daily basis, the material is transferred to one of two 10,000 gallon holding tanks. The waste in these tanks is stored for less than 90 days (approximately 2 months). As one tank becomes full, the material in the tank is sampled. Occasionally, this sampling indicates that the material in the storage tanks is non-hazardous. Presently, the one tank contains approximately 9,000 gallons of waste water. As explained by Mr. Struble,

To The File
From Brian Farbanish
Through Farouk Afrasiabi
Parker Amchem (PA), 557 Route 23 Wayne, N.J.

Facility Description And Operations Continued

this tank will soon be sampled. The material in this tank will then be removed by tanker truck and disposed of according to the sampling results. Currently, PA does not consider the material in this tank to be hazardous waste. If the sampling results indicate that this material is hazardous, then it will be manifested off site as a hazardous waste according to the 90 day accumulation start date (currently, the accumulation start date for this tank is 1/10/92).

As the first tank becomes full, the main valve is shut off and the waste water is transferred from the holding tank to the second 10,000 gallon storage tank.

No violations were issued at the conclusion of the inspection.

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

LDR Waste Management:

Summary:

Signature: Brian Fordham

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents: _____

2. F020-F023 and F026-F028 dioxin-containing wastes: _____

3. California List Wastes (See Appendix A): D007

4. First Third Wastes [40 CFR 268.10]: _____

5. Second Third Wastes [40 CFR 268.11]: _____

6. Third Third Wastes [40 CFR 268.12]**: D007, D007

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No ___

   If no, list below:

Assigned Classification	Correct Classification

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ___ No ___ NA ✓

Comments_____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments_____

C. **Does the facility handle the following wastes (national capacity variances)?**

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes___ No ✓ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ___ No ___ NA ✓

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D002	acids pH≤2	✓	
D001		✓	

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ___ No ✓ NA ___

c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ✓ NA ___

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ✓ NA ___

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ✓ No ___ NA ___

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
_____	_____	__/__/__
_____	_____	__/__/__
_____	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
____	_____	_____	_____
____	_____	_____	_____
____	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

Experience with waste

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

TCLP is only performed for unknown wastes (last sampling by outside lab 2/13/90) - waste water is sampled as needed by facility

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ✓ No ___ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

D002 - Sampled and analyzed prior to each removal of waste

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments_____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ___

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ✓

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments_____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D002	Chemical Waste Mgmt - Newark, NJ
D003	Chemical Waste Mgmt - Newark, NJ
D002	E.I. Dupont de Nemours - Deepwater, NJ

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

N/A

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ___ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling argreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ✓ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ___ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

Facility has TSD status but has been operating as a generator for the past 4 years - not permitted to delist because of soil contamination

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ___	No ___	NA ✓
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ✓
California List Wastes	Yes ___	No ___	NA ✓
First, Second, and Third Third Wastes	Yes ___	No ___	NA ✓

Comments_____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

N/A 3. What date was the waste analysis plan last revised? ___/___/___

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

N/A Yes ___ No ___

If yes, which of the following are sources of analytical data? (More than one may apply.):

___ Generator provides data
___ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ___ No ___ NA ___ normal analysis is performed by Parker Amchem in Michigan

If analyses are conducted off site, identify lab: - outside laboratory provides testing as necessary (Princeton Testing Laboratory Inc

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ___ NA ✓

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

N/A 1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

N/A 2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ___ No ___

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ___ No ___ NA ✓

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ✓

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. **Storage [40 CFR 268.50]**

1. Are prohibited* wastes stored on site in containers?

Yes ___ No ✓ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ___ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks? waste not stored over 90 days on site in tanks

Yes ___ No ✓ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ___ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ✓ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes___ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA___

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments_____

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes_____

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments_____

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

   Yes ___ No ✓ (If No, go to F.)

   List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

   Yes ___ No ___

   Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

   Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

   Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

   Yes ___ No ___

   Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments_____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ___ No ✓ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ___

Comments_____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____
_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. **Other Wastestreams**

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ___ No ✓ (If No, go to H.)

2. On-Site Management

a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ___

b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ___ No ___ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ___ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ___ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ___ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ___ (If No, go to c.)

Check appropriate category:

___Dilutes to meet treatment standards
___Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

H. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

_____
_____
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TOXICITY CHARACTERISTIC ("TC") INSPECTION CHECKLIST

1. Has the handler tested all its solid waste streams using the TCLP?

   Yes____ No V

   a) If no, are there any waste streams which should be tested.

   Explain No. Facility is currently testing all wastes listed on manifests. The proper descriptions are listed on the manifests

   b) If the handler is a TSD, has the owner/operator revised its waste analysis plan to incorporate the new TCLP requirements?

   N/A Yes____ No____ Facility is a generator with a TSD status

2. Does the handler generate waste exceeding the regulatory level for any constituent listed in Table I-TC?

   Yes V No____

   If no this checklist need not be completed.

3. Was the handlers waste(s) considered a federal hazardous waste prior to the promulgation of the new TCLP requirement?

   Yes V No____

   If No, proceed to question number 4. If yes, answer questions 3a), 3b) and 3c) and then stop.

   a) Have both the listed and characteristic waste code been assigned, were a listed waste exhibits a characteristic for which the waste is not listed?

   N/A Yes____ No____

   Comments _____

   b) Does the handler determine and list on its manifests all of it's waste(s) TCLP characteristics?

   Yes V No____

   Comments _____

c) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request indicating the new hazardous constituent(s) found in their waste(s)?

N/A Yes_____ No_____ Facility is generator with TSD status. Facility originally submitted a Part A application. This was withdrawn in 1987

4. Is the waste managed as a hazardous waste?

Yes ✓ No_____

If No, this is a high priority violation. Be sure to obtain a detailed description of the wastes final disposition.

Comments _____

a) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request for the previously unregulated waste or hazardous waste unit which has become subject to hazardous waste regulation as a result of the new TC Rule?

N/A Yes_____ No_____

NOTE: The inspector should bear in mind that any waste stream, unit or handler newly regulated on account of the change in the analytical procedures associated with the Toxicity Characteristic may now be subject to all the applicable requirements of N.J.A.C. 7:26-1, 7 - 12 and 40 C.F.R. Parts 260 - 270. All applicable current checklists should be used to determine compliance status.

EFFECTIVE DATES FOR COMPLIANCE WITH TC REQUIREMENTS

Generators of ≥1,000 kg/mo. of hazardous waste	9/25/90
Generators of <1,000 kg/mo. of hazardous waste	3/29/91

ADDITIONAL COMMENTS:_____

Subcategory Checklist

I. Characteristic Wastes.

A) Does facility handle D001 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Ignitable compressed gas	Yes_____	No_____
Ignitable liquids High TOC ≥ 10%	Yes_____	No_____
Ignitable liquids Low TOC < 10%	Yes_____	No_____
Ignitable reactives	Yes_____	No_____
Oxidizers [wastewater or non-wastewater]	Yes_____	No_____
Ignitible liquids [wastewater or non-wastewater]	Yes_____	No_____

B) Does facility handle D002 waste ?
Yes ✓ No_____
If yes, which subcategory(ies) ?

Acids, pH ≤ 2 [wastewater or non-wastewater]	Yes ✓	No_____
Alkaline, pH ≥ 12.5 [wastewater or non-wastewater]	Yes_____	No ✓
Radioactive high level wastes	Yes_____	No_____

C) Does facility handle D003 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Explosives [wastewater or non-wastewater]	Yes_____	No_____
Reactive cyanides:		
•wastewater - cyanides ≥ 0.86 ppm	Yes_____	No_____
•non-wastewater - total cyanides ≥ 590 ppm and amenable cyanides ≥ 30 ppm	Yes_____	No_____
Reactive sulfides [wastewater or non-wastewater]	Yes_____	No_____
Reactive [wastewater or non-wastewater]	Yes_____	No_____

D) Does facility handle D004 waste ?
Yes_____ No ✓
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No_____

E) Does facility handle D005 waste ?
Yes_____ No ✓
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No_____

F) Does facility handle D006 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

Cadmium batteries Yes_____ No_____
Radioactive high level wastes Yes_____ No_____

G) Does facility handle D007 waste ?
Yes✓_____ No_____
If yes, is it this subcategory ?

Radioactive high level wastes Yes_____ No✓_____

H) Does facility handle D008 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

Lead acid batteries Yes_____ No_____
Radioactive lead solids Yes_____ No_____
Radioactive high level wastes Yes_____ No_____

I) Does facility handle D009 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm [organics or non-organics] Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____
Elemental mercury with radioactive materials Yes_____ No_____
Hydraulic oil with mercury and radioactive materials Yes_____ No_____
Radioactive high level wastes Yes_____ No_____

J) Does facility handle D010 waste ?
Yes_____ No✓_____
If yes, is it this subcategory ?

Radioactive high level wastes ? Yes_____ No_____

II. Listed wastes

A) Does facility handle F001-F005 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

Non-pharmaceutical Yes_____ No_____
Pharmaceutical [methylene chloride ≥ 0.44 mg/l] Yes_____ No_____

B) Does facility handle F025 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Filters, filter aids, and/or desiccants [wastewater or non-wastewater] Yes_____ No_____
Light ends Yes_____ No_____

C) Does facility handle K061 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

High zinc ≥ 15% Yes_____ No_____
Low zinc < 15% Yes_____ No_____

D) Does facility handle K069 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Calcium sulfate Yes_____ No_____
Non-calcium sulfate Yes_____ No_____

E) Does facility handle K106 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

F) Does facility handle P065 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

G) Does facility handle P092 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

H) Does facility handle U151 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____
Radioactive elemental mercury Yes_____ No_____

California List Applicability

I. California List Waste Determination.

A) Using either knowledge of the waste or determination by the paint filter liquids test (PFLT), has the generator determined whether its waste is a liquid ?

Yes ✓ No ____

B) Current Applicability.

1) Do liquid hazardous wastes contain over 50 ppm PCBs ?

Yes ____ No ✓

2) Do hazardous wastes contain Halogenated Organic Compounds (HOCs) where it is identified as hazardous by a characteristic property that does not involve HOCs ?

Yes ____ No ✓

3) Do liquid hazardous wastes contain a total concentration of more than 134 mg/l of nickel and/or 130 mg/l of thallium ?

Yes ✓ No ____

See LDR Checklist pg. 8 if yes is answered to any of the above questions, the waste is currently subject to California List Prohibitions.

C) Historical Violations.

California List Prohibitions became effective on July 8, 1987 for wastes falling under any of the following descriptions:

1) Does the liquid hazardous waste, including free liquids associated with solid or sludge, contain free cyanide at concentrations $\geq$ 1000 mg/l ?

Yes ____ No ✓

2) Does liquid hazardous waste, including free liquids associated with any solid or sludge, contain the following metals (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to these prohibition levels ?

Yes ✓ No ____

Arsenic	500 mg/l	Yes ____	No ✓
Cadmium	100 mg/l	Yes ____	No ✓
Chromium VI	500 mg/l	Yes ____	No ✓
Lead	500 mg/l	Yes ____	No ✓
Mercury	20 mg/l	Yes ____	No ✓
Nickel	134 mg/l	Yes ✓	No ____
Selenium	100 mg/l	Yes ____	No ✓
Thallium	130 mg/l	Yes ____	No ✓

3) Does the liquid (aqueous) hazardous waste have a pH $\leq$ 2 ?

Yes ✓ No ____

4) Do HOC wastewaters, defined as HOC-waste mixtures that are primarily water, contain $\geq$ 1000 mg/l but < 10,000 mg/l ?

Yes ____ No ✓

5) Do other liquid hazardous wastes contain HOCs in total concentrations $\geq$ 1000 mg/l ?

Yes ____ No ✓

6) Do non-liquid hazardous wastes contain HOCs in total concentrations > 1000 mg/kg ?

Yes ____ No ✓

7) Do liquid hazardous wastes contain polychlorinated biphenyls (PCBs) at concentrations $\geq$ 50 ppm but < 500 ppm ?

Yes ____ No ✓

8) Does the liquid hazardous waste contain PCBs $\geq$ 500 ppm ?

Yes ____ No ✓

Waste Minimization Checklist

GENERATOR CHECKLIST

MANIFEST

GENERAL 262.20	YES	NO	N/A
Does the generator, offer for tranportation, hazardous waste for off-site treatment/disposal? If yes, proceed to next question. If no, proceed to 264.75/265.75.	✓		
262.23			
Does the generator sign the manifest certification which states;	✓		
" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the enviroment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."			
Does the generator have a written Waste Minimization Plan?		✓	
If no, is the generator able to describe his plan orally.	✓		

COMMENTS:
(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

- Facility is no longer storing waste over 90 days.
- Facility is no longer treating waste on site.
- Amount of Chromium used in product line (resulting in waste) has been reduced

ANNUAL/BIENNIAL REPORT

262.41	YES	NO	N/A
Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropiate regulatory agency?	✓		

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5)			
Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?	✓		
Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?	✓		
Do these efforts match the information contained in the generator's written or verbally described waste minimization program.	✓		
Is the BER or AR certification signed by the generator or authorized representatives?	✓		

TSDF CHECKLIST - facility does not store waste over 90 days - does not treate waste - Facility is a generator in a TSO status

The inspector should review a copy of the AR/BER prior to the inspection, and should try to verify the information in the report during his inspection. The following question should be addressed during the inspection.

	YES	NO	N/A
Does the AR/BER include the efforts undertaken during the year to reduce the volume of toxicity of the waste generated?	___	___	✓
Does the AR/BER include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?	___	___	✓
Doe these efforts match the information contained in the generator's written or verbally described waste minimization program			
Is the AR/BER certification signed by the generator or authorized representatives?	___	___	✓
264.75/265/75 (h-j) Does the generator treat, store and dispose hazardous waste on site?	___	___	✓ the facility only stores waste on site for up to 90 days - waste is not stored over 90 days and is not treated on site
If yes to the above question, does the generator submit BERs or ARs to the appropiate regulatory agency?	___	___	✓